

October 30, 2003

*Via e-mail*

Mr. Tracy Mehan  
The United States Environmental Protection Agency  
Assistant Administrator for Water

Subject: American Standard Inc. Comments on the October 9, 2003 Stakeholders  
Meeting on Water Efficiency

Dear Mr. Mehan,

American Standard, Inc. supports the development of voluntary initiatives, based on the current Energy Star Program, for water efficient products. As the world's largest manufacturer of plumbing fixtures and fixture fittings, we look forward to working with other stakeholders in the development of the criteria for such a program. In that regard, we offer the following comments from the initial stakeholders meeting on October 9, 2003.

As you know, the plumbing fixture industry continues to deal with perceptions and anecdotal reports of poor performance associated with the use of low-consumption toilets and showerheads. Providing an incentive to the industry to provide these products at even lower consumption levels, without the proper research to prove both efficacy and total plumbing system performance, would be a mistake and could seriously damage the credibility of such a program. We are specifically concerned with the following issues:

- Reduced consumption on toilets: Any consideration given to further reduce the consumption levels on toilets from the currently Federally mandated consumption standards must be verified by extensive laboratory research and field testing. While we are confident that toilet consumption levels can be slightly lowered and still effectively evacuate waste from the fixture, there will be need to study the effects of drain line carry in the multitude of sanitary drainage systems that such fixtures will be installed on. We agree with the comments provided at the stakeholders meeting by Mr. Stan Wolfson of the American Society of Plumbing Engineers, and with the written recommendations of the Steering Committee provided by Mr. Ed Osann at the stakeholders meeting, calling for such research. While this research is being conducted, other toilet attributes that work towards sustainability of current consumption levels throughout the life of the toilet should be considered when developing the criteria for the labeling program.
- Ranking toilet models for performance: While we agree that there is a need to stratify all products that are submitted for the program for performance, we must point out the inherent difficulties associated with doing so for toilets. In the past eighteen months, three very reputable testing organizations have attempted to rank toilet performance. All three organizations had very knowledgeable and qualified staff working on these programs and all had good intentions to provide consumers with valid information on which to make purchasing decisions. However, all three organizations came to very different conclusions, even on common models. In reality, there were some products that were unfairly characterized as poor performing toilets and others that received undeserving accolades. This underscores the need to develop a new and fair testing procedure for toilets that is developed with stakeholder input and is shown to be repeatable. We strongly disagree with comments that were made at the stakeholder meeting stating that there are current test procedures and test data available for this purpose. Obviously, providing inaccurate performance information to consumers would be worse than providing no information at all.
- Reduced flow rates for showerheads: While there is clear opportunity to reduce water consumption by using showerheads with lower flow rates, we are concerned with the increased risk potential for thermal shock associated with increasingly restricted showerheads, especially when installed on non-antiscald bath and shower fittings. With

this in mind, we recommend that showerheads that flow lower than the flow rates called for in the currently Federally mandated standard only be considered for such a program as a component part of a specifically designed anti-scald bath shower fitting. Research and testing must be conducted to establish the extent to which reductions in flow rates can be achieved without significantly increasing the thermal shock effect.

As one of the 117 organizations that co-signed the position paper calling for the development of this program, American Standard is anxious to help in the development of the criteria for the program. We support item number 8 in the written recommendations from the Steering Committee indicating the Committee's willingness to serve as a formal advisory body should one be established.

We recommend that, going forward, task forces be established for the development of criteria for specific product segments as detailed below:

- Plumbing Fixtures and Fixture Fittings
- Irrigation and Landscaping Systems
- Home Appliances
- Commercial Application Devices
- Sub-metering systems

Aligning task forces by industry segment will allow a more focused involvement by individual company stakeholders and industry associations. It is further recommended that the task forces report to a Steering Committee or other formal body, should one be established.

We appreciate the opportunity to comment on this program and we look forward to helping develop a program that works for the public, for conservation and for industry. Thank you for your consideration.

Respectfully submitted,

Peter DeMarco  
Director - Compliance Engineering  
Member of the Steering Committee

Phone - (732) 980-3472  
Fax - (732) 369-4011  
[demarcop@amstd.com](mailto:demarcop@amstd.com)